

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

RESIDENTIAL CAPITAL, LLC, *et al.*,

Debtors.

ROWENA DRENNEN, individually and as the representatives of the *KESSLER SETTLEMENT CLASS*, *et al.*,

Plaintiffs,

vs.

CERTAIN UNDERWRITERS AT LLOYD'S OF LONDON, *et al.*,

Defendants.

Bankruptcy Case No. 12-12020 (MG)
Chapter 11

Jointly Administered

RELATED CASE

District Court
Case No. 1:15-cv-02712 (JPO)

Adversary Case No. 15-01025 (DSJ)

**PLAINTIFFS' NOTICE OF MOTION AND MOTION TO WITHDRAW THE
REFERENCE OF THIS ACTION FROM THE BANKRUPTCY COURT**

TO THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

PLEASE TAKE NOTICE that Plaintiffs Rowena Drennen, Flora Gaskin, Roger and Christie Turner, John and Rebecca Picard, individually, and as the representatives of the Kessler Settlement Class; Steven and Ruth Mitchell, individually, and as representatives of the Mitchell Settlement Class; and the ResCap Liquidating Trust, as successor to Residential Funding Company, LLC, (collectively “Plaintiffs”) respectfully request that this Honorable Court enter an order withdrawing the reference of this action from the Bankruptcy Court, pursuant to 28 U.S.C. § 157(d), Fed. R. Bankr. P. 5011(a), and Local Bankruptcy Rule 5011-1. In support of this Motion, Plaintiffs rely upon the arguments and authorities presented in their accompanying Memorandum of Law, and the supporting declaration and exhibits thereto, which are incorporated as if set forth herein.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court withdraw the reference of this action from the Bankruptcy Court pursuant to 28 U.S.C. § 157(d), Fed. R. Bankr. P. 5011(a), and Local Bankruptcy Rule 5011-1, and grant such other and further relief as is equitable and just.

Dated: April 18, 2023

By: /s/ R. Frederick Walters

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CERTIFICATE OF SERVICE

I hereby certify that I filed this document electronically with the United States District Court for the Southern District of New York with notice of case activity to be generated and sent electronically by the Clerk of the Court to all designated persons this: **18th day of April 2023.**

By: /s/ R. Frederick Walters

**WALTERS RENWICK RICHARDS
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